

**Department for Communities and Local Government consultation
Planning Policy Statement 4: Planning for Sustainable Economic Development
March 2008**

Response of the Landscape Institute

Introduction

The Landscape Institute is the Chartered Institute in the UK for landscape architects, incorporating designers, managers and scientists, concerned with enhancing and conserving the environment. The Landscape Institute promotes the highest standards in the practice of landscape planning, design, management and research, representing members in private practice, at all levels of government and government agencies, in academic institutions and commercial organisations.

We welcome the opportunity to respond formally to the Department's consultation on Planning Policy Statement 4: Planning for Sustainable Economic Development (PPS4) and in so doing would like to state that we would welcome future engagement on related policy issues at the earliest possible opportunity in the consultation process.

General Comments on PPS4

There has never been a more important time to emphasise the role of landscape architecture because of growing social, political and economic concern over the use of our natural resources and the development of sustainable communities which underpin sustainable economic development. Landscape architecture is the profession best able to provide a holistic approach to creating places where people want to live and work both now and in the future and we believe it is through this all-encompassing approach to place shaping that will best deliver sustainable economic development.

Before moving on to our specific comments relating to the content of the draft PPS4, the Institute would like to emphasise the importance of the European Landscape Convention (ELC) with regards planning policy. The ELC came into force in the UK on 1st March 2007 and defines landscape as:

"An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors".

The premise of the ELC is that landscape, regardless of quality and whether rural or urban, built or natural, should be recognised, understood and fully integrated in the policy and decision making process. The Landscape Institute is disappointed that this draft planning policy statement does not sufficiently value the landscape context in which economic development takes place and would like to see greater recognition of its importance throughout the policy statement.

Specific Comments on PPS4

For ease of reference, the Institute's specific comments on PPS4 are presented here in the order in which they appear in the consultation document.

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Item 2

"Economic growth generates wealth and raises living standards. The planning system affects productivity and employment – the two drivers of economic growth – and influences wider economic objectives such as regeneration and the provision of new housing which contribute to quality of life".

The Landscape Institute recognises that economic growth raises living standards however it is important that if this PPS is to properly address the issue of sustainable economic development then a more holistic, landscape scale approach is adopted with adequate recognition within the document of the role of social and environmental factors in raising living standards.

Furthermore, we would like to point out that by no means is it a foregone conclusion that the provision of new housing will contribute to quality of life. There are many well known instances where the poor design of housing and surrounding space has in fact had a detrimental impact on residents' lives and would recommend that the Department re-word the second part of this statement so that "which" is supplemented with "can", i.e. "...the provision of new housing which can contribute to quality of life".

Item 5

"The planning system affects investment by providing certainty of land use and improvements in infrastructure. When firms and individuals are sure of the future use of their own and surrounding land then they are more likely to commit to investment"

The Landscape Institute would like to emphasise that landscape-scale planning incorporating the provision of and investment in green infrastructure is critical here, not only for its benefits in terms of climate change adaptation and mitigation but also because of its multi-faceted nature, providing space for recreation opportunities, community engagement, health and economic value for example. To achieve real sustainable economic development, it is imperative that this approach is adopted by planning authorities, particularly to ensure environments which are flexible and resilient in the face of a changing climate and which mitigate against further climate change.

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"Planning can help create sustainable communities which will enable people to meet their aspirations and potential"

The Landscape Institute feels it is necessary to include here some recognition of the importance of community engagement within the planning process. It is only via effective and transparent consultation processes that communities where people want to live and work both now and in the future will be established.

Also, under item 9, PPS4 states that regional planning bodies and local planning authorities should be enabled to *"...develop policies which allow a quick response to changing economic circumstances"*.

This is a cause of concern to the Landscape Institute and whilst appreciative of the need for the planning system to be flexible in the face of changing economic circumstances, this must not be at the expense of social and environmental considerations. There is a continued need for recognition that economic growth and natural and social/cultural capital are linked. We do not believe that there is a choice between economic growth and natural resource protection and enhancement, rather the two are inextricably linked and this linkage should be clearly acknowledged in PPS4, particularly so as the focus is on sustainable economic development.

Item 11

“The planning system needs to deliver economic development which is sensitive to the challenges of climate change.”

The Landscape Institute agrees with the above assertion and would like to point out that it is only via a holistic planning system that this will be achieved. Incorporating environmental considerations is critical to ensuring the planning system delivers economic development which is sensitive to the challenges of climate change.

Item 12

“In seeking to achieve positive planning for economic development, the Government’s desired objectives are:

- *High quality development and inclusive design for all forms of economic development;*
- *Avoiding adverse impacts on the environment, but where these are unavoidable, providing mitigation;*
- *Shaping travel demand by promoting sustainable travel choices wherever possible”.*

The Landscape Institute would like to see PPS4 ensure that ‘high quality development’ is clarified as a term which not only encompasses the building envelope but the wider context in which the development is taking place.

The Landscape Institute is, whilst appreciative of the focus of the PPS being on economic development, concerned that environmental considerations have are not afforded sufficient priority. Such considerations are critical to real sustainable economic development.

We are encouraged to see the inclusion of shaping travel demand to promote sustainable travel choices wherever possible.

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Items 15

“Both regional planning bodies and local planning authorities play a pivotal role as place shapers within their communities”

The Landscape Institute is encouraged by the above statement. However, a holistic, landscape-scale approach to place-shaping is required in this regard to ensure the delivery of high quality places in which people will want to live and work, and in which industry and entrepreneurs will be encouraged to invest, both now and in the future. The Institute is concerned however about the regional planning bodies’ and local planning authorities’ capacity to deliver this. Such bodies need to recognise the requirements of good place shaping at the earliest possible opportunity and address their all too frequent lack of landscape skills if quality places are to be realised.

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Item 25

The Landscape Institute welcomes the need to include a policy on tall buildings. Such buildings must be appropriately located and of high design quality. As visual impact assessment is one of the key professional areas of Institute members, it has a particular skill base in this area and considers that tall buildings must be subject to stringent visual impact assessment that includes cumulative

assessment if further tall buildings are to be considered. A carefully considered approach should be adopted in built environments where particular backdrops or heritage and visual links are a part of the landscape character of the town or city. The value of a high quality townscape can be realised in economic terms by being attractive for business and service location and promoting tourism, public health and civic pride and responsibility.

With regards to the assertion in PPS4 that local planning authorities should “Develop car parking policies for non-residential development at the local level, setting maximum standards, taking into account the following criteria...the need to encourage cycling, walking and sustainable modes of transport”, the Landscape Institute feels that sustainable transport, including spatial planning to support this, should be afforded a higher priority if sustainable development is to be achieved.

Item 26

“Local planning authorities should seek to ensure that economic development, regardless of location, is of high quality and inclusive design which improves the character and quality of an area and the way it functions”

The Landscape Institute is encouraged by this statement however would urge the inclusion of the terms “preserve” and “enhance” in addition to “improves”.

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The Landscape Institute welcomes that importance afforded to the provision of well designed open space and would like to highlight the potential multi-faceted nature of this asset, a point which should be included within PPS4.

Furthermore, we are encouraged by the recognition that telecommunications development must take into account the potential impact on the built, historic and natural environment, though wonder why this point has been restricted to such developments only. It is the view of the Landscape Institute that all forms of development proposals should adequately consider the wider potential impact.

Item 28

“Full consideration should be given to economic aspects of a planning proposal, alongside social and environmental aspects”.

The Landscape Institute is concerned at the apparent priority afforded to economic aspects in this statement and would recommend it is reworded to ensure that full consideration is also given to social and environmental factors as these will be play a critical role in achieving sustainable economic development.

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Item 32

“Local planning authorities should...recognise that a site may be an acceptable location for development even though it may not be readily accessible by public transport.”

Whilst appreciative of the rural context of this item, the Landscape Institute is concerned by this statement in which a more relaxed and flexible approach to car use and parking is implicitly

encouraged. Such an approach appears unlikely to assist in progressing the Government's commitments on renewable energy and carbon emission reductions.

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Item 4 – Appropriate weighting given to economic development

“When drawing up plans, regional planning bodies and local planning authorities should give appropriate weighting to the economic benefits that developments may bring...”

The Institute has concerns regarding the term 'appropriate weighting' and feels that further guidance is provided by the Department to clarify what it means by this.

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Item 34 – High Quality Environment

The Landscape Institute is encouraged by the inclusion of the importance of good design within PPS4 however would recommend that the term 'design' is expanded upon to include site planning and landscape design to ensure that the adequate consideration is afforded to the wider context in which economic development takes place.

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Sustainable Development, Carbon assessment, Other Environment

The Landscape Institute strongly recommends that climate change adaptation is also included here.

Specific questions posed in the consultation document

1. *Do the policies set out in the Planning Policy Statement on Sustainable Economic Development achieve the right balance between economic, social and environmental considerations? Will they help deliver sustainable development?*

The Landscape Institute believes that, whilst appreciative of the fact this the PPS is on the theme of economic development, insufficient consideration have been given to social, environmental and cultural factors which would assist in delivering sustainability.

The Landscape Institute would like to thank the Department for Communities and Local Government for being given the opportunity to contribute to these proposals. For any queries relating to this response, or for future consultations, please contact:

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